

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PFIZER INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 17-158 (LPS)
)	CONSOLIDATED
MICRO LABS USA INC., et al.,)	
)	
Defendants.)	

**PLAINTIFFS' NOTICE OF DEPOSITION TO
SUN DEFENDANTS PURSUANT TO FED. R. CIV. P. 30(B)(6)**

PLEASE TAKE NOTE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs Pfizer Inc., PF PRISM C.V., C.P. Pharmaceuticals International C.V., Pfizer Pharmaceuticals LLC, and Pfizer PFE Ireland Pharmaceuticals Holding 1 B.V. ("Pfizer" or "Plaintiffs"), by and through their undersigned counsel, will take the deposition(s) by oral testimony of defendants Sun Pharmaceutical Industries Limited and Sun Pharmaceutical Industries, Inc. (collectively "Sun"), on the topics set forth in Schedule A, attached hereto, commencing at 9:30 a.m. on February 19, 2019, at the offices of Arnold & Porter Kaye Scholer LLP, 250 West 55th Street, New York, NY 10019-9710, or at such other place and time as may be mutually agreeable. The deposition(s) shall be taken before an officer, notary public, or other person duly authorized to administer oaths.

Pursuant to Federal Rule of Civil Procedure 30(b)(3), the testimony will be recorded by stenographic, audio, and video means. The deposition(s) will be taken for the purposes of discovery, use at trial in this action, and any other purposes permitted under the Federal Rules of Civil Procedure. Pursuant to Rule 30(b)(6), Sun shall designate one or more officers, directors, managing agents, or other representative(s) who consent to testify on its behalf to matters known

or reasonably available to Sun regarding the topics listed herein. To the extent more than one deponent is identified, Sun shall state in advance of the deposition which portions of this Notice each deponent is prepared to address.

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/s/ Megan E. Dellinger

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January 23, 2019

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SCHEDULE A: 30(b)(6) Deposition Topics

The Definitions and Instructions set forth in Plaintiffs' First Set of Requests for the Production of Documents and Things to Sun and Plaintiffs' First Sets of Common Interrogatories to Defendants are incorporated herein by reference.

In accordance with the Federal Rules of Civil Procedure 30(b)(6), Pfizer identifies the following matters for examination.

1. The preparation and contents of Sun's ANDA No. 209790 including, without limitation, Sun's decision to submit a paragraph IV certification to market Sun's Accused Product prior to the expiration of the Patents in Suit.

2. The proposed labeling, package insert, and prescribing information for Sun's Accused Product, including, without limitation, the preparation and contemplated use of the proposed labeling, package insert, and prescribing information.

3. The development, characterization, and testing of Sun's Accused Product and/or the API in Sun's Accused Product, including without limitation any polymorphic or stereoisomer characterization or analysis.

4. Sun's plans for manufacturing, marketing, and distributing Sun's Accused Product.

5. Market analysis, market research, and projections regarding sales of Xeljanz[®] or any generic tofacitinib product, including Sun's Accused Product.

6. Sun's decision to develop and market Sun's Accused Product and to file ANDA No. 209790.

7. The preparation and contents of the January 5, 2017, and September 26, 2017, notice letters sent by Sun to Pfizer, including the detailed statements attached thereto.

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on January 23, 2019, upon the following in the manner indicated:

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